

Mieles, Janette

From: Taylor, Karen
Sent: Tuesday, June 18, 2013 11:18 AM
To: Jamison, Rebecca
Cc: Mcchesney, Dennis; Sawyer, William
Subject: RE: PR UST regulations - penalty matrix and red tag

EQB stated that inspectors do not have the authority to issue penalty to support the proposed field citation program (which was presumably patterned after EPA's). Converting the proposed field citation penalties to a penalty matrix is basically putting a penalty policy in the regulations, whether you call it a matrix or policy. My comment was that the proposed field citation/penalty matrix is not as flexible or comprehensive as a penalty policy.

Do you have the 1990 PRUST Part X which included the section on shutting down a station for failure to comply?
Did you compare the old Part X to the new section for fuel delivery bans?
The PRUST copy that is circulated within ORC does not contain that Part of the PRUST.

From: Jamison, Rebecca
Sent: Tuesday, June 18, 2013 10:32 AM
To: Taylor, Karen
Cc: McChesney, Dennis
Subject: Meet prior to July 3rd? FW: Meeting Forward Notification: UST EAct regulations--finalize

Karen—should we plan to meet and discuss the EQB regulations prior to the call with EQB on July 3rd?

And if you have time today, I can explain to you what was happening on the call yesterday with the penalty appendix which should have just been referred to as the “penalty matrix” and not “policy”.

From: Microsoft Outlook **On Behalf Of** Taylor, Karen
Sent: Tuesday, June 18, 2013 10:03 AM
To: Jamison, Rebecca
Subject: Meeting Forward Notification: UST EAct regulations--finalize

Your meeting was forwarded

[Taylor, Karen](#) has forwarded your meeting request to additional recipients.

Meeting

UST EAct regulations--finalize

Meeting Time

Wednesday, July 03, 2013 2:00 PM-4:00 PM.

Recipients

[Sawyer, William](#)

All times listed are in the following time zone: (UTC-05:00) Eastern Time (US & Canada)

